

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION

**MICHAEL RUSSELL**

**PLAINTIFF**

**VERSUS**

**CIVIL ACTION NO. 1:20-CV-0003-SA-DAS**

**CITY OF TUPELO, MISSISSIPPI,  
ALLAN GILBERT, in His Individual Capacity,  
and BART AGUIRRE, in his Individual Capacity,**

**DEFENDANTS**

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**PLAINTIFF'S RESPONSE TO DEFENDANTS'  
MOTION TO BIFURCATE ISSUE OF PUNITIVE DAMAGES [114]**

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In response to Defendants' Motion to Bifurcate Issue of Punitive Damages [114], Plaintiff Michael Russell agrees that the punitive damages issue should be bifurcated.

RESPECTFULLY SUBMITTED, this the 1st day of November, 2021.

MICHAEL RUSSELL, Plaintiff

By:

/s/ Jim Waide

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Ron L. Woodruff, MS Bar No. 100391

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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

This will certify that undersigned counsel for Plaintiff has this day filed the above and foregoing with the Clerk of the Court, utilizing this court's ECF system, which sent notification of such filing to the following:

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DATED, this the 1st day of November, 2021.

*/s/ Jim Waide*

JIM WAIDE